

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

UMB BANK, NA, as Trustee

*Petitioner and Plaintiff*

v.

19-cv-00182-WES-PAS

CITY OF CENTRAL FALLS; JAMES A. DIOSSA,  
MAYOR OF THE CITY OF CENTRAL FALLS;  
MARIA RIVERA, CITY COUNCILOR; JONATHAN  
ACOSTA, CITY COUNCILOR; HUGO FIGUEROA,  
CITY COUNCILOR; FRANKLIN SOLANO, CITY  
COUNCILOR; JESSICA VEGA, CITY COUNCILOR;  
CENTRAL FALLS DETENTION FACILITY  
CORPORATION, WILDER ARBODELDA,  
CORPORATION DIRECTOR; GARY BERDUGO,  
CORPORATION DIRECTOR; JOSEPH MOLINA  
FLYNN, CORPORATION DIRECTOR; and  
HERMAN YIP, CORPORATION DIRECTOR.

*Respondent and Defendants.*

**MOTION TO CONTINUE STAY AND  
APPOINTMENT OF SPECIAL MASTER**

Plaintiff UMB Bank, NA, Defendants City of Central Falls, James A. Diossa, Maria Rivera, Jonathan Acosta, Hugo Figueroa, Franklin Solano, Jessica Vega, and the Central Falls Detention Facility Corporation (collectively, “Moving Parties”) request that the appointment of the Special Master and the litigation stay as to the Moving Parties be extended to May 20, 2021.

1. By text order dated November 17, 2020, the Court extended the stay and appointment of the Special Master until February 17, 2020.
2. Magistrate Judge Sullivan met and communicated with the parties and their counsel numerous times pursuant to the Court’s September 18, 2019 referral of this matter to Her Honor for settlement purposes.

3. All parties appreciate Magistrate Judge Sullivan's diligent efforts, and the Moving Parties believe that additional time to further those settlement discussions would be fruitful. Continuing the stay will allow the parties to focus their attention on potential resolutions and continue their ongoing conversations on various settlement issues.

4. The Moving Parties also request that the Special Master's appointment be extended.

WHEREFORE, the Moving Parties request that the appointment of the Special Master and the litigation stay as to the Moving Parties be extended to May 20, 2021.

**LOCAL RULE CV 7(c) STATEMENT**

No oral argument requested.

**UMB Bank, N.A., as Trustee**

By its Attorneys,

/s/ Robert M. Duffy

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**CITY OF CENTRAL FALLS, JAMES A. DIOSSA, MAYOR OF THE CITY OF CENTRAL FALLS, MARIA RIVERA, CITY COUNCILOR; JONATHAN ACOSTA, CITY COUNCILOR; HUGO FIGUEROA, CITY COUNCILOR; FRANKLIN SOLANO, CITY COUNCILOR; JESSICA VEGA, CITY COUNCILOR**

By their Attorneys,

/s/ Nicholas J. Hemond

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-and-

*/s/ Matthew T. Jerzyk*  
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**CENTRAL FALLS DETENTION  
FACILITY CORPORATION**

By its Attorneys,

*/s/ Brian J. Lamoureux*  
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**CERTIFICATION**

On February 17, 2021, I caused this document to be electronically filed using the Court's electronic filing system. Therefore, it is available for viewing by registered users who have signed up to receive notices in this case.

*/s/ Brian J. Lamoureux*